

UNITED STATES BANKRUPTCY COURT FOR
THE NORTHERN DISTRICT OF ILLINOIS
EASTERN DIVISION

In re:)	
)	Case No. 24-18991
Dovgal Express, Inc.)	
)	Hon. Timothy A. Barnes
Debtor.)	
)	Chapter 11

NOTICE OF MOTION

TO: ATTACHED SERVICE LIST

PLEASE TAKE NOTICE that on the January 22, 2025, at 9:00 a.m., I will appear before the **Honorable Timothy A. Barnes** or any judge sitting in that judge's place either in courtroom 744 of the United States Bankruptcy Court, 219 South Dearborn Street, Chicago, IL , 60601, or electronically as described below, and present and present the **MOTION FOR ENTRY OF AN ORDER SETTING BAR DATE FOR FILING PROOFS OF CLAIM AND APPROVING FORM OF PROPOSED NOTICE**, a copy of which is attached.

Important: Only parties and their counsel may appear for presentment of the motion electronically using Zoom for Government. All others must appear in person.

To appear by Zoom using the internet, go to this link: <https://www.zoomgov.com/>. Then enter the meeting ID and passcode.

To appear by Zoom using a telephone, call Zoom for Government at 1-669-254-5252 or 1-646-828-7666. Then enter the meeting ID and passcode. Meeting ID and passcode.

Meeting ID and passcode is the Meeting ID: 161 329 5276 and the passcode is 433658. The meeting ID and passcode can also be found on the judge's page on the court's web site.

If you object to this motion and want it called on the presentment date above, you may file a Notice of Objection no later than two (2) business days before that date. If a Notice of Objection is timely filed, the motion will be called on the presentment date. If no Notice of Objection is timely filed, the court may grant the motion in advance without a hearing.

By: /O. Allan Fridman

Atty. No. 6274954
O. Allan Fridman
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CERTIFICATE OF SERVICE

I, O. Allan Fridman, certify that I served a copy of this notice and the attached motion on each entity shown on the attached list at the address shown and by the method indicated on the list on January 14, 2025.

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CDL Recruiting and
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Commercial Credit Group,
Inc.
2135 City Gate Lane Suite
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Naperville, IL 60563
Compass Payment Services
115 W 55th St
Hinsdale, IL 60521
Divvy Inc
6220 America Center
Drive, 100
Alviso, CA 95002
Donald Djanchou
3209 Dunleasf Arcway
Norcross, GA 30093
Dovgal Enterprises
2064 W. 167TH ST.
Markham, IL 60428

Empire Leasing, LLC
2364 ESSINGTON RD
#118
Joliet, IL 60435
Golan Christie Tagla LLP
70 W Madison St, 312-
Chicago, IL 60602
Markham Truck Center Inc
2120 W 167th St Suite D
Markham, IL 60428
Penske Truck Leasing Co.
PO Box 802577
Chicago, IL 60680
Quality Alarm Systems,
Inc.
5532 West Cal-Sag Road
Alsip, IL 60805
Rock Solid Private
Investigators
15726 Paulina Avenue
Harvey, IL 60426
Ryder Transportation
Services
P.O. BOX 96723
Chicago, IL 60693-6723

Ryder Truck Rental
PO Box 96723
Chicago, IL 60693
SIEMENS FINANCIAL
SERVICES, INC
170 Wood Ave. South
Iselin, NJ 08830
Transportation Alliance
Bank, Inc.,
4185 Harrison Blvd, Suite
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USI Insurance Services
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3190 Fairview Park Dr #
400
Falls Church, VA 22042
VVT Group
Strada Mesager 24, MD-
2069,
Kishinev Moldova

UNITED STATES BANKRUPTCY COURT
FOR THE NORTHERN DISTRICT OF ILLINOIS
EASTERN DIVISION

In re:)
) Case No. 24-18991
Dovgal Express, Inc.)
) Hon. Timothy A. Barnes Debtor.
)
) Chapter 11

**MOTION OF DEBTOR FOR ENTRY OF AN ORDER SETTING BAR DATE FOR
FILING PROOFS OF CLAIMS AND
APPROVING FORM OF PROPOSED NOTICE TO CREDITORS**

Dovgal Express, Inc. an Illinois Corporation, debtor/debtor-in- possession herein (“Debtor”), by and through its attorney, pursuant to Section 501 of Chapter 11 of Title 11 of the United States Code (the “Bankruptcy Code”), and Rules 2002(a)(7) and 3003(c) of the Federal Rules of Bankruptcy Procedure (the “Bankruptcy Rules”), requests the entry of an Order: (i) fixing March 31, 2025 as the last day for any individual or entity to timely file proof of claims for pre-petition claims, (ii) fixing June 18, 2025, for any governmental unit, and (iii) approving a proposed form of Notice of the claims bar date (the “Motion”), and in support of the Motion, the Debtor respectfully states as follows:

Introduction

1. On December 20, 2024, the Debtor filed its voluntary petition for relief under Chapter 11 of the Bankruptcy Code (“Petition Date”).
2. The Debtor has been operating its business and managing its financial affairs as debtor-in-possession since the Petition Date.
3. No trustee, examiner or official committee of unsecured creditors has been appointed in this case.
4. This matter constitutes a “core” proceeding within the meaning of 28 U.S.C.

Sections 157(b)(2)(A), (M) and (O).

5. The statutory predicates for the relief requested in this Motion are Sections 105 and 363 of the Bankruptcy Code, and Rules 2002(a) (7) and 303(c) of the Bankruptcy Rules of Bankruptcy Procedure.

Relevant Factual Background

6. The Debtor is an Illinois corporation operating from 2064 W. 167th Street, Markham, IL 60428.

7. The Debtor is currently engaged in the business of leasing trucks and trailers to transportation companies. The Debtor was previously involved in transportation business shipping loads throughout the United States. Due to the economic down turn in the trucking industry beginning in 2022, that resulted in higher fuel prices and lower rates per mile, the Debtor has pivoted to leasing trucks and trailers to other transportation companies to enable it to secure a steady stream of income through the lease of truck and trailers.

Establishment of Bar Date

8. It is necessary to establish a bar date for creditors to file claims so as to facilitate a Plan of Reorganization.

9. The Debtor requests that this Court establish March 31, 2025, as the date by which pre-petition creditors, exclusive of governmental units, must file their claims or be forever barred from asserting such claims, and the Debtor requests that this Court establish June 18, 2025, as the date by which governmental units must file their pre-petition claims or be forever barred from asserting such claims. The Debtor further requests that this Court approve the proposed form of Order attached to the motion, to be provided to creditors in connection with the Bar Date.

WHEREFORE, Dovgal Express, Inc., debtor-debtor-in-possession, prays for the entry of an Order establishing bar dates for the filing of pre-petition claims and granting such other relief as may be just and appropriate.

Respectfully submitted,

Dovgal Express, Inc.

By: /O. Allan Fridman

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